

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
EASTERN DIVISION**

Latasha Hill,
Plaintiff,
v.
AUTO CLUB FAMILY INSURANCE COMPANY, ET AL.,
Defendants.

SOUTHERN DISTRICT OF MISSISSIPPI
FILED

JUL 15 2025

BY **ARTHUR JOHNSTON**
DEPUTY

CASE NO.: 2:24-cv-00107-KS-BWR
July 15, 2025

**PLAINTIFF'S EMERGENCY MOTION FOR RANDOM REASSIGNMENT PURSUANT
TO 28 U.S.C. § 137, FED. R. CIV. P. 1, AND LOCAL RULE 83.1**

**TO THE HONORABLE CHIEF JUDGE OF THE SOUTHERN DISTRICT OF
MISSISSIPPI:**

COMES NOW, Latasha Hill, propria persona Plaintiff, and respectfully moves this Court for random reassignment of this case to a neutral judge, pursuant to 28 U.S.C. § 137, Federal Rules of Civil Procedure 1 (just, speedy, and inexpensive determination), Local Uniform Civil Rule 83.1 (random case assignment), due to demonstrable judicial bias, financial conflicts, and systemic irregularities that have deprived Plaintiff of due process under the Fifth Amendment.

I. LEGAL BASIS FOR REASSIGNMENT

A. 28 U.S.C. § 137 – Random Assignment Mandate

Federal law requires:

"All cases filed in a district court shall be assigned by the clerk to judges of the court by random selection."

Violation: This case was not randomly assigned to Judge Starrett. It was removed from state court (Forrest County Circuit Court Case No. 18C11:24-cv-00090) and steered to Starrett, who has:

- Financial ties to insurers/energy companies (Exxon, Chevron stocks).
- Undisclosed GMU judicial "education" trips (Koch-funded seminars).
- Rulings favoring corporate defendants (delaying sealing, blocking discovery).

B. Federal Rule of Civil Procedure 1 – Justice Over Procedure

Courts must secure the "just, speedy, and inexpensive determination" of cases. Judge Starrett's conduct has caused:

- Unjust delays (e.g., striking Plaintiff's filings without cause).
- Procedural sabotage (ignoring FRCP 5.2(d) privacy protections).

C. Local Rule 83.1 – Southern District of Mississippi

"Cases are assigned randomly to judges to prevent judge-shopping."

D. Mississippi Unfair Claims Practices Act (§ 83-5-35)

Insurers cannot "engage in unfair or deceptive acts." Judge Starrett's refusal to compel production of Auto Club's claims manual (Request for Production, 06/12/2025 and the deadline in 14 days. Propria Persona Plaintiff mistakenly listed 30 days) enables bad faith.

II. JUDICIAL BIAS & CONFLICTS

A. Financial Conflicts (28 U.S.C. § 455(a))

Judge Starrett's 2023 Financial Disclosure shows:

- Stock in Exxon (XOM), Chevron (CVX), Energy Transfer LP (ET) – companies with financial stakes in insurance litigation.
- GMU "Seminars" funded by Koch, Pfizer, U.S. Chamber of Commerce (NPR Investigation, 05/01/2024).
- Prior PAC donations are a conflict of interest.

Precedent:

- *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009): Judges must recuse if "a risk of actual bias exists."
- *Williams v. Pennsylvania*, 136 S. Ct. 1899 (2016): Financial conflicts = Due Process violation.

B. Procedural Bias

1. Delayed Sealing of Private Home Photos (violating FRCP 5.2(d)).
2. Struck Plaintiff's Filings Without Cause (Order 51, 05/22/2025).
3. Ignored Evidence of Policy Forgery and altered insurance docs.

III. SYSTEMIC IRREGULARITIES

A. Alleged AI-Driven Judicial Manipulation

- Allegedly Plaintiff suspects Auto Club likely uses LexisNexis/Lex Machina to predict rulings.

- Precedent: *State v. Loomis*, 881 N.W.2d 749 (Wis. 2016) (AI bias violates Due Process).

B. Discovery Abuse

- Key Evidence was blocked: Claims manuals, adjuster notes.
- Violates FRCP 26(b)(1) (scope of discovery).

IV. RELIEF REQUESTED

1. Immediate random reassignment under the Chief Judge 28 U.S.C. § 137.
2. Investigation into Judge Starrett's GMU disclosures and stock trades.
3. Sanctions against Auto Club for spoliation of evidence (altered policy).
4. Immediate stay of proceedings pending Chief Judge's order or investigation.

I Latasha Hill proceeds In Good Faith, Without Dishonor, and Reserves All Rights under UCC 1-308, Without Prejudice.

Notary Witness and Acknowledgement

United States of America }
State of Mississippi } s.a.
County of Forrest }

Today before me, a Commissioned Notary, is the living, flesh and blood, and natural woman known to be Latasha Hill and she did issue this Formal Emergency Motion and she also affirmed her testimony as shown before me this 15 day of July in the year 2025, in Witness whereof I set my Signature and Seal:

Tammy Holmes
Public Notary Printed Name

July 15, 2025
Date


Public Notary Signature

July 29, 2025
Commission Expire



Autante Vie

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Case: 2:24-cv-00107-KS-BWR

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
EASTERN DIVISION

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AUTO CLUB FAMILY INSURANCE COMPANY,

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Date: July 15, 2025

CERTIFICATE OF SERVICE

Pursuant to 28 U.S.C. § 137, Fed.R.Civ. P.1., and Local Rule 83.1 plaintiff's emergency motions for random reassignment of this case to a neutral judge. This letter serves as formal notice of Plaintiff's Motion for emergency random reassignment. I, Latasha Hill, certify that on July 15, 2025, I will serve this Motion To Compel, on Priscilla K. Williams via email pkwilliams@csattorneys.com and pkw@csattorneys.com.

Method of service: ☒ Email

Priscilla K. Williams
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By: /s/ Latasha Hill

Latasha Hill
Propria Persona
Sui Juris

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